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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 STEVEN LAWRENCE ROBINSON, and,
NATHANIEL OPONDO HUBBERT,
15 Defendants.

CASE NO. 2:20-CR-00123-JAM
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER
DATE: August 4, 2020
TIME: 9:30 a.m.
COURT: Hon. John A. Mendez

17 STIPULATION

18 1. By previous order, this matter was set for status on August 4, 2020.

19 2. By this stipulation, defendants now move to continue the status conference until

20 September 1, 2020 at 9:30 a.m., and to exclude time between August 4, 2020, and September 1, 2020,
21 under Local Code T4.

22 3. The parties agree and stipulate, and request that the Court find the following:

23 a) The government has represented that the discovery associated with this case
24 includes over eight gigabytes of evidence in electronic form, including police reports, pictures,
25 multiple hours of video footage, laboratory reports, search warrants, and a forensic cellular
26 phone report. The government has represented to defense counsel that it has provided the
27 majority of this initial discovery and anticipates providing the remaining initial discovery by
28 August 4, 2020.

1 b) Counsel for defendants desire additional time consult with their clients, review the
2 existing discovery, to discuss potential resolutions with their clients, and to otherwise prepare for
3 trial.

4 c) Counsel for defendants believe that failure to grant the above-requested
5 continuance would deny them the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of August 4, 2020 to September 1,
13 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
14 T4] because it results from a continuance granted by the Court at defendant's request on the basis
15 of the Court's finding that the ends of justice served by taking such action outweigh the best
16 interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

5 Dated: August 3, 2020

McGREGOR W. SCOTT
United States Attorney

9 Dated: August 3, 2020

/s/ ADRIAN T. KINSELLA
ADRIAN T. KINSELLA
Assistant United States Attorney

12 Dated: August 3, 2020

/s/ MEGAN T. HOPKINS
MEGAN T. HOPKINS
Counsel for Defendant
STEVEN LAWRENCE ROBINSON

12 Dated: August 3, 2020

/s/ KRESTA DALY
KRESTA DALY
Counsel for Defendant
NATHANIEL OPONDO HUBBERT

15 **FINDINGS AND ORDER**

16 IT IS SO FOUND AND ORDERED this 3rd day of August, 2020.

18 /s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE